

COMMONWEALTH OF MASSACHUSETTS

DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

Proceeding by the Department of Telecommunications  
and Energy on its own Motion to Implement the  
Requirements of the Federal Communications  
Commission's Triennial Review Order Regarding  
Switching for Mass Market Customers

D.T.E. 03-60

**RESPONSE OF UNITED SYSTEMS ACCESS TELECOM, INC. TO  
MCI's FIRST SET OF INFORMATION REQUESTS TO  
COMPETITIVE LOCAL EXCHANGE CARRIERS**

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MCI-CLEC-1            Please state whether you are an incumbent local exchange provider ("ILEC") or are an affiliate of an ILEC providing telecommunications service in Massachusetts. If you are an affiliate of an ILEC, please identify the ILEC and describe the affiliation. For purposes of these Requests, "affiliate" shall be as defined in the Communications Act of 1934. Section 3 of the Act defines the term "affiliate" as "a person that (directly or indirectly) owns or controls, is owned or controlled by, or is under common ownership or control with, another person. For the purposes of this paragraph, the term 'own' means to own an equity interest (or the equivalent thereof) of more than 10 percent." 47 U.S.C. § 153(1).

**Response: USAT is neither an ILEC, nor an affiliate of an ILEC providing telecommunication services in Massachusetts.**

**Person Responding: Stephen J. Gilbert, President & CEO of USAT**

MCI-CLEC-2            Please state whether you are an affiliate of a competitive local exchange carrier (“CLEC”) providing telecommunications service in Massachusetts. If you are an affiliate of an CLEC, please identify the CLEC and describe the affiliation. For purposes of these Requests, “affiliate” shall be as defined in the Communications Act of 1934. Section 3 of the Act defines the term “affiliate” as “a person that (directly or indirectly) owns or controls, is owned or controlled by, or is under common ownership or control with, another person. For the purposes of this paragraph, the term ‘own’ means to own an equity interest (or the equivalent thereof) of more than 10 percent.” 47 U.S.C. § 153(1)

**Response: USAT is not an affiliate of a CLEC providing telecommunication services in Massachusetts.**

**Person Responding: Stephen J. Gilbert, President & CEO of USAT**

MCI-CLEC-3            Do you lease 2-wire voice-grade loops from Verizon to provide local exchange service in Massachusetts? (For purposes of this question, please do not include any DS-0 or voice grade circuits that are part of a DS-1.)

**Response: Yes.**

**Person Responding: Stephen J. Gilbert, President & CEO of USAT**

MCI-CLEC-4            Do you use non-ILEC switches to provide local exchange service to Massachusetts customers? (For purposes of this question, please do not include any DS-0 or voice grade switched circuits that are part of a DS-1.)

**Response: No.**

**Person Responding: Stephen J. Gilbert, President & CEO of USAT**

MCI-CLEC-5            To the extent that you have not already provided this information in response to the Massachusetts Department of Telecommunications and Energy's Information Requests, please provide the following information for each switch owned by you that you use to provide local exchange service to Massachusetts customers

- a. the 8-digit common language location identifier ("CLLI") code as it appears in the Local Exchange Routing Guide ("LERG");
- b. V&H coordinates;
- c. street address, city and zip code;
- d. currently equipped line side capacity in
  - i. DS-0/voice grade circuits and
  - ii. DS-1 circuits;
- e. currently utilized line side capacity in
  - i. DS-0/voice grade circuits and
  - ii. DS-1 circuits;
- f. current switch processor capacity in CCS;
- g. busy hour and busy season utilized switch processor capacity in CCS;
- h. function of the switch (e.g., stand-alone, host, or remote, other [e.g. DLC node with no intelligence and/or no or limited switching capability]).

**Response: USAT does not own any switches used to provide local exchange service to its Massachusetts customers.**

**Person Responding: Stephen J. Gilbert, President & CEO of USAT**

MCI-CLEC-6

Using the switches identified in CLEC-5:

- a: Do you currently provide local exchange service to residential customers in Massachusetts? If so, are you currently advertising this service? Are you currently marketing this service? Please explain [e.g. broadcast or print advertising, telemarketing, direct mail, Internet, etc.].
- b. Do you currently provide local exchange service to business customers in Massachusetts? If so, are you currently advertising this service? Are you currently marketing this service? Please explain.
- c: Please provide a description of each of the residential and/or business local exchange products that you currently provide to Massachusetts customers using voice grade, non T-1 loops. You may choose to respond by completing the following matrix.

Product Name	Available to Res. Customers?	Available to Bus. Customers?	Retail Price?	Bundled with LD or DSL Service?	Available as Standalone Local Product?	Currently Advertising?	Currently Marketing?
[Name of product]	[Yes/No]	[Yes/No]	[\$X.XX]	[Yes/No]	[Yes/No]	[Yes/No]	[Yes/No]

- d. For each switch identified in CLEC-5 other than circuit switches, please provide the following additional information regarding the local exchange service that you provide:
- i. How many telephony customers do you serve via that switch?
  - ii. To what percentage of those customers do you provide standalone local exchange service (i.e. no broadband, no cable television)? What is the retail price for this service?
  - iii. To what percentage of those customers do you provide local exchange service and broadband service but not cable television service? What is the price for this service?
  - iv. To what percentage of those customers do you provide local exchange service and cable television service but not broadband service? What is the price for this service?
  - v. To what percentage of those customers do you provide local exchange service, cable television service, and broadband service? What is the price for this service?

**Response: Not Applicable.**

**Person Responding: Stephen J. Gilbert, President & CEO of USAT**

MCI-CLEC-8            Please provide, on a statewide, CLEC switch CLLI-code, and Verizon wire center basis, for the most recently available time period, the total number of:

- a. Active business lines served by unbundled loops;
- b. Active business lines served by UNE-P;
- c. Active business lines served by non-circuit switches;
- d. Active residential lines served by unbundled loops;
- e. Active residential lines served by UNE-P;
- f. Active residential lines served by non-circuit switches.

If you are unable to provide information responsive to all three geographies, please provide responsive information to the extent it is available. Please do not include T-1 level or above loops in your response.

**Response:**

- a. None
- b. **Please see attached. All figures responsive to this question are statewide for the period of January 1, 2003 through December 31, 2003.**
- c. None
- d. None
- e. **Please see attached. All figures responsive to this question are statewide for the period of January 1, 2003 through December 31, 2003.**
- f. None

**Person Responding: Stephen J. Gilbert, President & CEO of USAT**



MCI-CLEC-9            If you do not currently offer service to business customers in Massachusetts below the DS-1 level (i.e., DS-0/voice grade loops), please list and describe your reasons for not doing so.

**Response: Not Applicable. USAT currently offers this service.**

**Person Responding: Stephen J. Gilbert, President & CEO of USAT**

MCI-CLEC-10            If you currently offer service to business customers in Massachusetts below the DS-1 level (i.e., DS-0/voice grade loops), but do not offer and/or market service to such customers unless they have or need a certain minimum number of loops to their premises, please state that minimum number, and list and describe your reasons for not offering and/or marketing service below that level.

**Response: Not Applicable.**

**Person Responding: Stephen J. Gilbert, President & CEO of USAT**

MCI-CLEC-11            For each switch identified in your response to CLEC-5, please provide the information requested in TABLES 1A, 1B, and 1C. If you are unable to provide information responsive to all three tables, please provide responsive information to the extent it is available. Please do not include T-1 level or above loops in your response.

**Response: Not Applicable.**

**Person Responding: Stephen J. Gilbert, President & CEO of USAT**

MCI-CLEC-12            For each switch identified in your response to CLEC-5 other than circuit switches, please provide the following for each switch:

- g. the date(s) on which you installed the switch and began providing local exchange service on the switch;
- h. the geographic area served by the switch compared to the geographic area served by any circuit switches you use to provide local exchange service;
- i. any differences in the technical or operational requirements for the customer to obtain local exchange service from the switch, including customer premises equipment or software (e.g., specialized phone set; availability of computer, cable modem, set top box, need for customer premises battery backup for telephone service), access method (e.g., DSL, cable television, satellite service), provisioning interval.

**Response: Not Applicable.**

**Person Responding: Stephen J. Gilbert, President & CEO of USAT**

MCI-CLEC-13            Do your Massachusetts intrastate tariffs limit in any way the availability of your local exchange service products, either by geography, class of customer, or otherwise? If so, please explain the limitation, including an explanation of the service delivery mechanism by which you offer the product (e.g. UNE-P, UNE-L, non-circuit-switched, etc.).

**Response: USAT is a switchless reseller and UNE-P provider of phone service – our local exchange service products are only available in Verizon’s territory in Massachusetts. In addition, we are not designated as an ETC in Massachusetts and cannot offer the Lifeline discount for customers who request such service. Our tariffs do not limit the availability of our products in any other way.**

**Person Responding: Stephen J. Gilbert, President & CEO of USAT**

MCI-CLEC-14            Have you made any changes to your Massachusetts intrastate tariffs in the last 24 months that would limit the availability of your local exchange service, either by restricting the geographic area in which you offer your service, restricting the customers to whom you service is available, or otherwise? If so, please explain.

**Response: No.**

**Person Responding: Stephen J. Gilbert, President & CEO of USAT**

MCI-CLEC-15            Please explain whether you currently have in place application-to-application, electronically integrated systems that can accomplish, on an automated, flow-through basis (i.e. no manual intervention is required for completion of the migration), migrations between each of the following service configurations: 1) VZ voice only; 2) VZ voice plus DSL; 3) VZ DSL only; 4) CLEC UNE-P voice only; 5) CLEC switch-based voice only; 6) CLEC line sharing; 7) CLEC line splitting; 8) CLEC DSL only. To the extent possible, please answer by completing the following matrix, indicating "Yes" or "No" in each box.

**Response: USAT does not have systems to accomplish such automated migrations.**

**Person Responding: Stephen J. Gilbert, President & CEO of USAT**

MCI-CLEC-16            Please explain whether you have always been able to obtain a customer service record ("CSR") from Verizon and/or other CLECs for the provision of 1) local exchange voice service on UNE-P; 2) local exchange voice service on UNE loop. If not, please provide a detailed explanation of the reason(s) you did not obtain the CSR.

**Response: USAT has never been given access to Verizon North CSRs for its Massachusetts UNE-P customers. USAT cannot provide a detailed explanation of the reason(s) why it cannot obtain Verizon North CSRs because it has never received such an explanation from Verizon. However, USAT has always had access to Verizon South CSRs.**

**Person Responding: Stephen J. Gilbert, President & CEO of USAT**



MCI-CLEC-17            Please explain whether you currently use an electronic automated (i.e., not requiring any manual intervention prior to completion of task) method to interface with Verizon to send or receive each of the following: a) pre-order inquiries; b) orders (including placing the order, firm order confirmations, jeopardy notices, etc); c) provisioning (including the exchange of information for changes to 911, local number portability, and other databases); d) maintenance and repair; e) billing.

**Response: USAT does not use any such electronic automated methods to interface with Verizon and send or receive any of the items described in a-e.**

**Person Responding: Stephen J. Gilbert, President & CEO of USAT**

MCI-CLEC-18            Please provide a detailed explanation of the electronic method (e.g. EDI, CORBA, etc.) that you currently use to send to or receive from ILECs and/or CLECs each of the following: a) pre-order inquiries; b) orders (including placing the order, firm order confirmations, jeopardy notices, etc.); c) provisioning (including the exchange of information for changes to 911, local number portability, and other databases); d) maintenance and repair; e) billing.

**Response: USAT has no agreements between other CLECs to provide local service to its customers in Massachusetts. In addition, USAT has no arrangement or agreement with other CLECs regarding sharing of information of customer accounts. Therefore, USAT does not utilize any of the described methods of interaction.**

**Person Responding: Stephen J. Gilbert, President & CEO of USAT**

MCI-CLEC-19 Please explain whether you currently have in place and use electronic automated systems to:

- a: Process orders placed by customers whose service will be provisioned using your own switches.
- b. Provision service for customers using your own switches
- c: Maintain and repair service for customers whose service is provisioned using your own switches.
- j. Conduct trouble isolation and repair for customer services provisioned via your own switches using UNE loops.
- k. Conduct testing for customer services provisioned via your own switches using UNE loops.
- l. Bill customers whose services are provisioned using your own switches.

If with respect to your answer to any of the above subparts your systems are only partially electronic, please identify specifically which portions are electronic, and which are manual, and provide a detailed explanation of the limitations created by the manual portions.

**Response: Not applicable. USAT does not own any switches that provide service to its customers in Massachusetts.**

**Person Responding: Stephen J. Gilbert, President & CEO of USAT**